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16 **UNITED STATES DISTRICT COURT**
17
18 **DISTRICT OF NEVADA**

19
20 ALISON MULLANEY, an individual,
21 Plaintiff,
22 vs.
23 THE TRAVELERS INDEMNITY COMPANY a
24 foreign Corporation; DOES I through X,
25 inclusive; and ROE CORPORATIONS I through
X, inclusive,
Defendants.

Case No.: 2:23-cv-01530-JAD-BNW

**STIPULATION AND REQUEST FOR
ORDER TO EXTEND DISCOVERY
DEADLINES**

[FIRST REQUEST]

26 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Alison Mullaney
27 ("Plaintiff"), and Defendant The Travelers Indemnity Company ("Defendant") by and through their
28 undersigned counsel of record, stipulate to extend the un-expired discovery deadlines by forty-five
(45) days pursuant to LR IA 6-1, LR IA 6-2, and LR 26-3. This stipulation is made in good faith and
not for purposes of delay.

29 **I. DISCOVERY COMPLETED**

30 1. On October 16, 2023, the parties participated in a Rule 26(f) conference.
31
32 2. On November 17, 2023, Plaintiff served her first set of requests for admission, requests
33 for production of documents, and interrogatories to Defendant, and Defendant served its responses to

1 each on January 2, 2023.

2 3. On December 26, 2023, Plaintiff served her initial disclosures.

3 4. On January 10, 2024, Defendant served its initial disclosures.

4 5. The parties have continued to meet and confer on various written discovery issues and
5 are working to resolve as many as possible without involving the Court.

6 6. To that end, the parties have had multiple phone calls on January 5, 2024, January 12,
7 2024, and January 23, 2024, to meet and confer, discuss discovery requests and responses, and obtain
8 witness availability for conducting depositions.

9 **II. DISCOVERY THAT REMAINS TO BE COMPLETED AND REASONS
10 SUPPORTING THE REQUESTED EXTENSION**

11 1. Deposition of Plaintiff;

12 2. Deposition of Valerie B. Vo;

13 3. Deposition of 30(b)(6);

14 4. Deposition of Mary C. Liparulo, RN;

15 5. FRCP 35 medical examination of Plaintiff;

16 6. The parties will take the depositions of any and all other necessary witnesses as
17 determined through discovery. The parties are coordinating on scheduling those depositions, along
18 with any others;

19 7. The parties will issue and respond to any necessary additional written discovery; and

20 8. Any additional discovery as needed.

21 The reason for the requested extension has been the unavailability of Valerie Vo, who is a key
22 witness to this case. Ms. Vo had been away from the company on personal leave and has recently
23 returned back to work and is in the process of coordinating the dates for her deposition. The parties
24 have been cooperating on discovery and on coordinating depositions, however, the depositions will
25 be conducted in February, which will not give the parties enough time to get the information from the
26 depositions to complete initial expert disclosures. As such, the parties are seeking a forty-five (45)
27 day extension on the discovery deadlines, which will allow the parties to take all necessary depositions
28 and follow up with any necessary written discovery within the time frame of the extension.

1 **III. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

	<u>Current Discovery Deadlines:</u>	<u>Proposed Discovery Deadlines:</u>
1. Discovery cut-off:	<u>April 14, 2024</u>	<u>May 29, 2024</u>
2. Amend /add parties:	<u>January 15, 2024</u>	<u>No change.</u>
3. Initial experts:	<u>February 14, 2024</u>	<u>April 1, 2024</u>
4. Rebuttal experts:	<u>March 15, 2024</u>	<u>April 29, 2024</u>
5. Dispositive motions:	<u>May 14, 2024</u>	<u>June 28, 2024</u>
6. Pretrial order:	<u>May 16, 2024</u>	<u>July 1, 2024</u>

9 This is the parties' first stipulated request for extension of discovery deadlines. This request
10 for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it
11 is sought by the parties solely for the purpose of allowing sufficient time to finish necessary discovery.
12 The parties respectfully and mutually submit that the reasons set forth above constitute compelling
13 reasons for their requested extension.

14 DATED this 24th day of January, 2024.

14 DATED this 24th day of January, 2024.

15 **MAIER GUTIERREZ & ASSOCIATES**

15 **WORTHE HANSON & WORTHE**

16 */s/ Joseph A. Gutierrez*

16 */s/ John R. Hanson*

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19 1851 East First Street, Suite 860
20 Santa Ana, California 92705
21 *Attorneys for Defendant*

23 **ORDER**

24 **IT IS SO ORDERED.**

26 DATED: 1/25/2024

27 
28 UNITED STATES MAGISTRATE JUDGE

Yadira Gonzalez

From: John Hanson <jhanson@whwlawcorp.com>
Sent: Wednesday, January 24, 2024 2:25 PM
To: Yadira Gonzalez
Cc: Joseph Gutierrez; Stephen Clough
Subject: RE: Mullaney v. The Travelers Indemnity Company, et al. - SAO to Extend Discovery

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Hi Yadira,

Thanks for sending this. You have my authority to affix my electronic signature to the stipulation.

Thanks,
John

John R. Hanson
Main: (714) 285-9600
Extension 103

WORTHE HANSON & WORTHE



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Sent: Wednesday, January 24, 2024 2:24 PM
To: John Hanson <jhanson@whwlawcorp.com>
Cc: Joseph Gutierrez <jag@mgalaw.com>; Stephen Clough <sgc@mgalaw.com>
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Good afternoon Mr. Hanson,

Attach, please see the SAO to extend discovery deadlines. Please review and advise if I may affix your electronic signature.

Thank you.

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